BEFORE THE

STATE CORPORATION COMMISSION

OF VIRGINIA

Application of	)	
	)	
Verizon Virginia Inc.	)	**Case No. PUC-2007-______**
and	)	
Verizon South Inc.	)	
	)	
For a Determination that Retail Services Are	)	
Competitive and Deregulating and Detariffing	)	
of the Same	)	

SOUTHSIDE (SSDE) EXHIBITS

PUBLIC VERSION

Southside (SSDE) Exhibits

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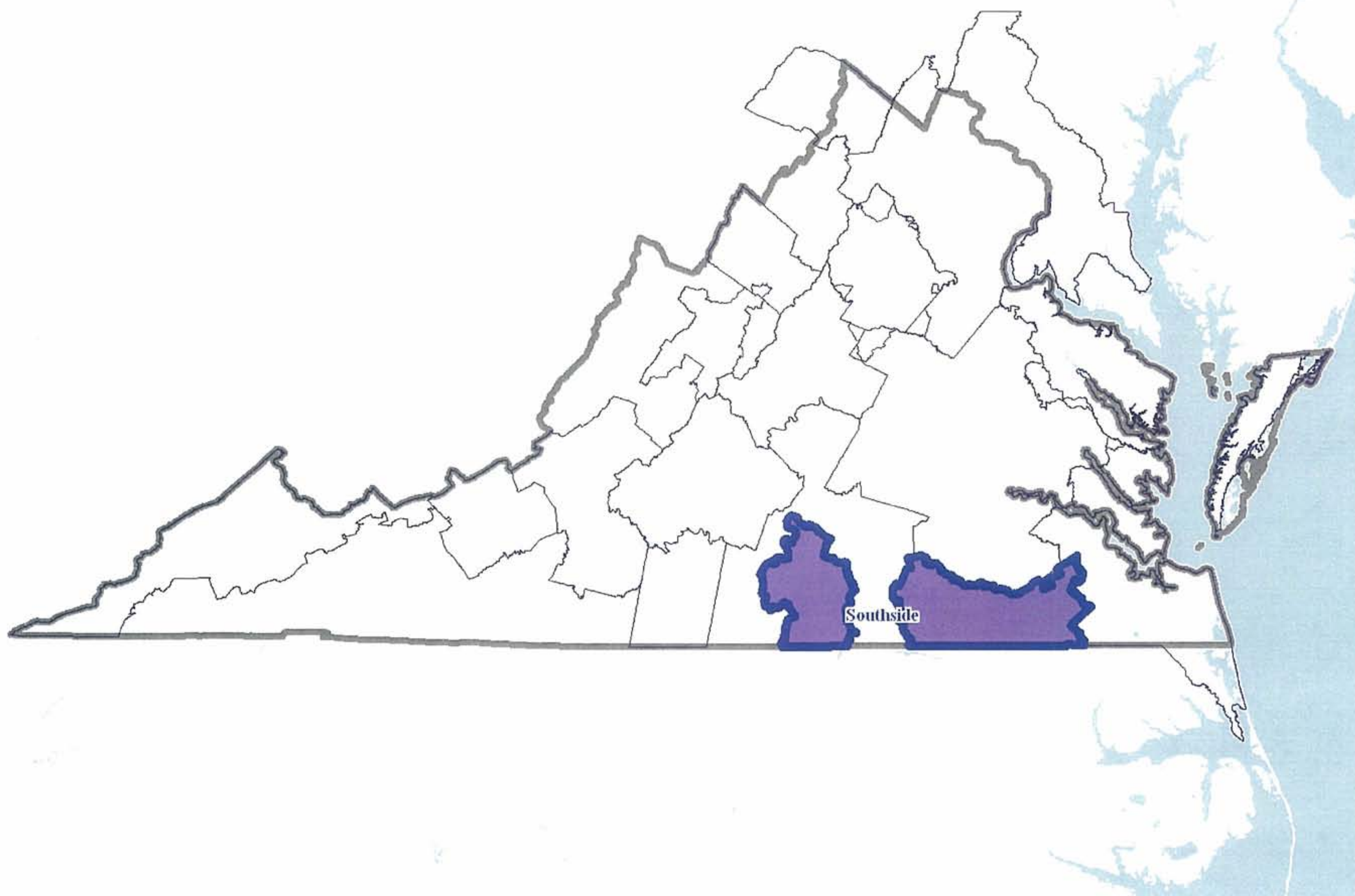
SSDE-1

Southside Region



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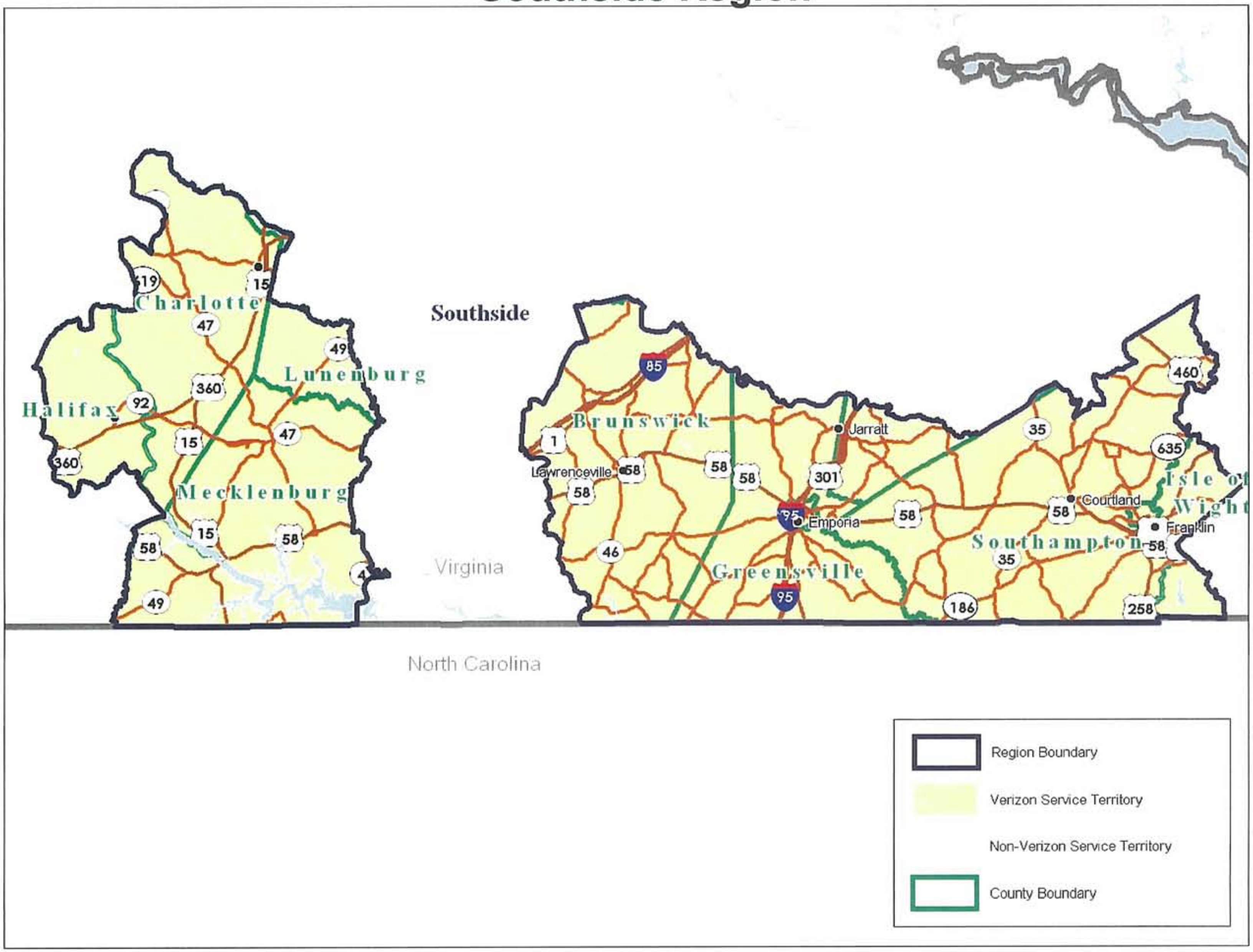
Southside Region



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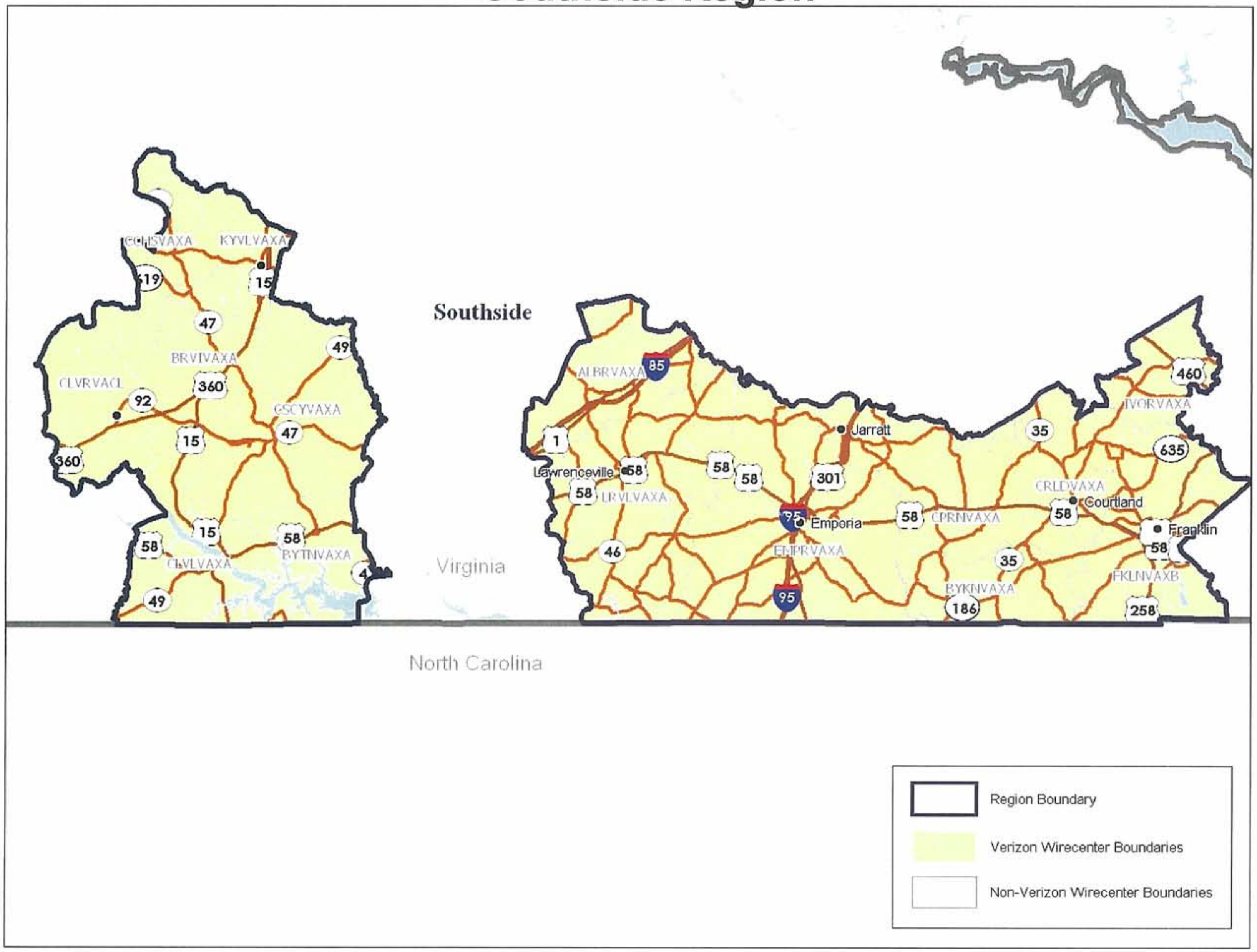
Southside Region



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SSDE-2

Exhibit SSDE-2

COMPETITION AND POTENTIAL COMPETITION FOR RETAIL TELECOMMUNICATIONS SERVICES IN VERIZON'S SOUTHSIDE REGION SERVICE TERRITORY

Report of Jeffrey A. Eisenach, Ph.D.
January 17, 2007

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I. OVERVIEW

Verizon's service territory in the Southside MSA consists of 2,444 square miles, with a population of 94,137 living in 35,354 households as of 2006; there are 3,580 business establishments.[1] The average population density is 39 residents per square mile, and the median household income is $36,484.[2] Verizon operates 19 wire centers in the region.[3]

The Southside region is located in the 434 and 757 area codes. It consists of two separate service territories. The eastern portion of the region is bordered on the east by the VNN Region, on the north by the Richmond region, on the south by North Carolina and on the west by an area served by Embarq; it is bisected by I-95 running north to south, and is also crossed in the northwest by I-85. The western portion of the region is bordered on the east, north and west by an area served by Embarq, and on the south by North Carolina. It is bisected from north to south by Route 15.[4]

Both areas are comprised of rural counties, including Southampton, Greensville, Brunswick, Mecklenberg and Lunenburg. Population densities are low throughout the region. The lowest density wire centers are: Eppes Fork, on the North Carolina border in southern Mecklenburg County; and, Alberta, in Northern Brunswick County.[5] Both have population densities of 19 persons per square mile. The most densely populated wire center is Franklin, on the eastern border of the region in Southampton County, which has 80 persons per square mile.[6]

Competition in the Southside region is present and growing. The evidence presented below shows that virtually all households and businesses have access to BLETS and OLETS from traditional CLECs and from CMRS providers. Traditional wireline CLECs serve customers in **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** [7] Broadband services are available from Comcast and Charter, as well as from fixed wireless broadband providers.

There are no barriers to entry. Recently there has been significant entry, and more is expected. For example, both cable companies operating in the region are expected to roll out cable telephone services in the near future, including Charter, which passes over 40 percent of households, and Comcast, which serves 17 percent. In addition, new broadband providers, including providers utilizing fixed wireless technologies, have recently begun providing next generation broadband services in the Southside region. Importantly, both Kentucky Data Link and the Mid-Atlantic Broadband Cooperative are in the process of constructing high capacity fiber optic networks that cross the region, providing numerous new points of presence, in addition to existing POPs operated by Cavalier and Continental VisiNet in Emporia.

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1. *See* Exhibit SSDE-4.
2. *See id.*
3. *See* Exhibit SSDE-3.
4. *See* Exhibit SSDE-1.
5. *See* Exhibit SSDE-1.
6. *See* Exhibit SSDE-4.
7. *See* Exhibit SSDE-15.

The analysis below of the availability and usage of existing alternative services, and of the conditions associated with potential competition and new entry, demonstrates that a combination of existing and potential competition regulate the prices of Verizon's retail telephony services in the Southside region.

II. AVAILABILITY OF ALTERNATIVE SERVICES

All 35,354 households in the Southside region and all 3,580 businesses in the Southside region have the option to obtain alternatives to Verizon's BLETS, OLETS and Bundled Services from competitive providers. The options available include both facilities-based CLECs and others operating through resale and/or Wholesale Advantage agreements, CMRS providers, and broadband providers whose services allow consumers to choose retail telephone services from VoIP providers.

A. Traditional CLECs[8]

Traditional CLECs provide competition throughout the Southside MSA, and facilities-based competition is present.

Based on Verizon's E911 data, **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** [11]

In addition, all households and businesses in the Southside region can receive service from traditional CLECs through resale and/or Wholesale Advantage services available from Verizon.[12] As of March 2006, **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**

Altogether, a total of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**

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8. Here and in the remaining sections of this report, unless otherwise indicated, "traditional CLEC" refers to CLECs other than cable companies. "CLEC" refers to both traditional CLECs and cable companies.
9. *See* Exhibits SSDE-15 and Exhibit SSDE-17. The E911 data includes lines that are unable to be assigned to a wirecenter. These unassignable lines are included in the aggregate competition information. This leads to some under representation of E911 lines when broken out by wire center.
10. *See* Exhibit SSDE-14.
11. *See* Exhibit SSDE-15 and Exhibit SSDE-4.
12. *See* Exhibit SSDE-16.
13. *See* Exhibit SSDE-16.
14. *See* Exhibit SSDE-15.

B. Cable Telephony

Two cable companies serve a significant number of customers in the Southside region, Charter and Comcast (which purchased Adelphia's systems in the region).[15] Charter passes 41.0 percent of households, while Comcast passes 16.9 percent.[16] Neither company currently offers cable telephony in the region, though all of Comcast and nearly all of Charter's infrastructure have been upgraded and thus are capable of supporting voice service.[17]

C. Mobile Telephony

Of the 35,354 households in the Southside region, virtually 100 percent (all but 15) have access to at least one CMRS provider, and 93 percent (all but 2,817) have access to two or more carriers.[18] In addition to Verizon Wireless, there are six CMRS providers offering retail telephone services in the Southside region.[19] They are Alltel, Cingular, NTELOS, Sprint, T-Mobile, and US Cellular.

There are 80 cellular towers in the Southside region.[20] Of these, eight have been constructed since 2004.[21] There is at least one cellular tower located in the area served by 16 of the 19 Verizon wire centers.[22]

D. Broadband and VoIP

Increasingly, consumers are choosing to combine stand-alone broadband Internet access with VoIP services provided by "bring your own access" companies such as Vonage, thus creating their own bundles of broadband and retail telephony services. Both broadband and VoIP services are available to well over half of Southside region households and businesses.

<u>Cable Modem and DSL Service</u>: Charter offers cable modem service to approximately 82 percent of homes passed, and Comcast makes the service available throughout its service territories in the region.[23] Together, the companies offer the service to 50.7 percent of households.[24] In addition, Verizon makes DSL service without voice available to **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]** of households for $26.99 per month.

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15. *See* Exhibit VA-10 and Exhibit SSDE-9.
16. *See id.*
17. *See* Comcast, FAQ, https://www.comcast.com/Customers/FAQ/FaqDetails.ashx?Id=3804 (last visited Dec. 3, 2006); *id.* at https://www.comcast.com/Customers/FAQ/FaqDetails.ashx?Id=3807 (last visited Dec. 3, 2006).
18. *See* Exhibit SSDE-12.
19. *See* Exhibit SSDE-11.
20. *See* Exhibit SSDE-10.
21. *See id.*
22. *Compare* Exhibit SSDE-3 and Exhibit SSDE-10.
23. *See* Exhibit VA-10 and Exhibit SSDE-8.
24. *See* Exhibit VA-4.

Fixed Wireless Service: In addition to wireline cable modem and DSL service, more than half of households (53 percent) have access to fixed wireless broadband services.[25] Providers include:

- Pure Internet: Pure Internet provides services in Charlotte County, including Drakes Branch and Keysville, Brookneal, Halifax, South Boston, Clover, Virgilina, Turbeville, Vernon Hill, and Volens. The company offers both traditional dial-up and "Wireless DSL" services. Wireless DSL prices begin at $39.95 for residential customers. Pure's website highlights the importance of the additional fiber being constructed by the Mid-Atlantic Broadband Cooperative in the region. The company indicates that it "is actively making high speed point-to-point wireless connections to many Mid-Atlantic Broadband POPs throughout Southern Virginia."[26]

- Kinex Networking Solutions: Kinex also offers fixed wireless broadband services in "downtown Farmville and in Halifax, Brookneal, South Boston and Keysville through our affiliate." The company says it is "expanding this service," and urges visitors to its web site to "check back periodically to see when it will be available in your area."[27]

- Buggs.net: Buggs.net is a subsidiary of the Buggs Island Telephone Cooperative, and began offering fixed wireless broadband services in South Hill in 2004. Service starts at $39.99 monthly for 768Kbps and ranges to $69.99 for 2Mbps. Business plans are $99.00 per month for 1.5Mbps download and 768Kbps upload speeds.

- Telpage: Telpage provides fixed wireless broadband solutions to residential and business customers in the Southside region. Rates begin at $59.95 per month for 512 Kbps and range up to 1 Mbps.

While none of the firms discussed above offer bundles that include VoIP services, customers have the option of purchasing alternatives to Verizon's BLETS, OLETS and Bundled Services from by-pass VoIP companies. VoIP providers that offer telephone numbers in the 757 and 434 area codes include Vonage, at&t, Net2Phone, Sun Rocket, and Packet8.[28]

E. Overall Availability of Alternative Platforms and Competitors

Looking overall at the availability of service from alternative platform providers (i.e., from mobile wireless, cable modem, DSL, facilities-based CLECs, and fixed wireless), 100 percent of all households in the Southside region have service available from at least one alternative platform provider and 42 percent have service from three or more alternative platforms.[29]

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25. *See* Exhibit VA-4.
26. Pure Internet, http://www.pure.net (last visited Oct. 19, 2006).
27. Kinex, http://www.kinex.net (last visited Oct. 19, 2006). *See also* Press Release, Kinex, Kinex Brings Competition to Drakes Branch, June 7, 2004, *available at* http://www.kinex.net/news/news_item.2004-06-07.1149200316.
28. *See* West Testimony at 81.
29. *See* Exhibit VA-4 and Exhibit SSDE-5.

Similarly, looking overall at the availability of service from all competitors – i.e., the same measure as above, but counting each competitor separately (e.g., counting each CMRS provider separately), competition is even more extensive: 100 percent of households have competitive alternatives from at least two competitors, and 54 percent have access to service from five or more Verizon competitors.[30]

III. USAGE OF ALTERNATIVE SERVICES

Verizon's internal data shows that at least **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]** of wireline telephone lines in the Southside region were being served by competitors as of March 2006. However, these figures understate the true market share of competitors, since they fail to account for intermodal competition, such as from wireless and broadband.

Survey data indicates that **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]** of households subscribe to broadband. Taking intermodal competition into account, the data presented below show that Verizon voice lines now account for only 45.3 percent of all wireline telephony, wireless telephony and broadband connections in the region.

Time series data presented at the end of this section also shows that Verizon's wireline market share is falling, both in proportion to the number of wirelines served and relative to the number of households in the region. Taken together, the data presented in detail below demonstrates that the competitive alternatives described in Section II represent viable alternatives for Verizon's BLETS, OLETS and Bundled Services in the Southside region, since customers are actually switching to them in large numbers.

A. Traditional CLECs and Cable Telephony

As detailed in Exhibit SSDE-15, a total of **[BEGIN CONFIDENTIAL]**

[END CONFIDENTIAL] [33]

Based on the survey data presented by Mr. Newman, **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]** of residential customers in the Southside region are using

30. *See* Exhibit VA-5 and Exhibit SSDE-6.
31. This figure does not include approximately six percent of the population (who by definition were not reached through Verizon's telephone survey) who have cut the cord altogether. *See* West Testimony at p. 63, n. 84.
32. *See* Exhibit SSDE-15.
33. *See* Exhibit SSDE-19.

providers other than Verizon, suggesting that the line count data above are conservative.[34] In rural areas (including the Southside region), the survey shows that 7.2 percent of POTS business customers and 10.1 percent of all business customers are using other providers.[35]

Exhibit SSDE-15 also demonstrates that wireline competition is ubiquitous throughout the Southside region. It shows that competitors are actually serving business and/or residential customers in **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** of the 19 wire centers, including the smallest and most rural wire centers.[36] Furthermore, facilities-based competition is also present. While the number of lines is small, **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** These data demonstrate that alternatives to Verizon's BLETS, OLETS and Bundled Services from wireline competitors are available and in widespread use by both residential and enterprise customers throughout the Southside region.

B. Mobile Telephony

The survey data presented by Mr. Newman shows that **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** of households in the Southside region purchase telephone service from mobile telephone companies.[38] **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**[39]

While Mr. Newman's testimony does not provide data on business usage of mobile telephones specifically for the Southside region, it does indicate that the proportion of businesses in rural regions (including the Southside region) which purchase mobile telephone service is 49.2 percent,[40] and that 12.7 percent of business respondents consider their mobile telephone to be their primary means of voice communication.[41]

These figures do not include mobile telephone customers who have dropped their wireline service altogether, as these customers were not eligible for the telephone survey. As Mr. West's testimony indicates, national estimates suggest that that approximately six percent of residential customers have "cut the cord."[42]

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34. *See* Exhibit VA-21.
35. *See* Exhibit VA-20.
36. *See* Exhibit SSDE-15.
37. *See id.*
38. *See* Exhibit VA-21.
39. *See id.*
40. *See* Exhibit VA-20.
41. *See id.*
42. West Testimony at p. 63, n. 84.

Again, these figures demonstrate that the mobile wireless alternatives available to consumers in the Southside region function as actual, viable alternatives to Verizon's BLETS, OLETS and Bundled Services.

C. Broadband and VoIP

The survey data presented by Mr. Newman show that **[BEGIN CONFIDENTIAL]**

[END CONFIDENTIAL][43]

The survey data presented by Mr. Newman show that in rural areas in Virginia (including the Southside region), 48.5 percent of businesses subscribe to high-speed broadband service.[44]

These overall usage rates for broadband demonstrate that the broadband plus VoIP "build your own bundle" option is available today to a significant number of both residential and business customers, which already subscribe to broadband service.

D. Overall Penetration of Wireline and Intermodal Competition

While it is not possible to estimate precisely the number of lines Verizon has lost to wireline and intermodal competitors, it is clear that competition is having an impact on Verizon's market share, both in terms of wireline telephony and the overall markets for BLETS, OLETS and bundled services, and that wireline competitors are winning a growing proportion of customers. The data also indicate that intermodal competitors are winning a growing proportion of customers from wireline carriers of all types (i.e., including both Verizon and the traditional CLECs and cable telephony providers).

Both Verizon's line count and its wireline market share in the Southside region are dropping. As indicated in Figure 1 below, between December 2003 and March 2006 (i.e., in 27 months), the ratio of Verizon lines to households fell from **[BEGIN CONFIDENTIAL]**

[END CONFIDENTIAL] drop in Verizon's residential wireline count.[46]

During this same 27-month period, the number of residential wirelines served by wireline CLECs rose by **[BEGIN CONFIDENTIAL]**

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43. *See* Exhibit VA-21.
44. *See id.*
45. *See* Exhibit SSDE-4 and Exhibit SSDE-19.
46. *See* Exhibit SSDE-19.
47. *See id.*
48. *See id.*

[END CONFIDENTIAL][50]

Figure 1 also demonstrates the significance of intermodal competition from wireless telephony and from broadband plus VoIP "build you own" bundles. It shows that the ratio of combined Verizon and CLEC residential lines to households fell from **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]**[51] Assuming people have not stopped using voice telephony altogether, these data clearly indicate that wireless and broadband providers are competing effectively with both Verizon and other traditional wireline providers – a conclusion which is consistent with the high rates of wireless telephony usage and broadband adoption as discussed above.

[BEGIN CONFIDENTIAL]

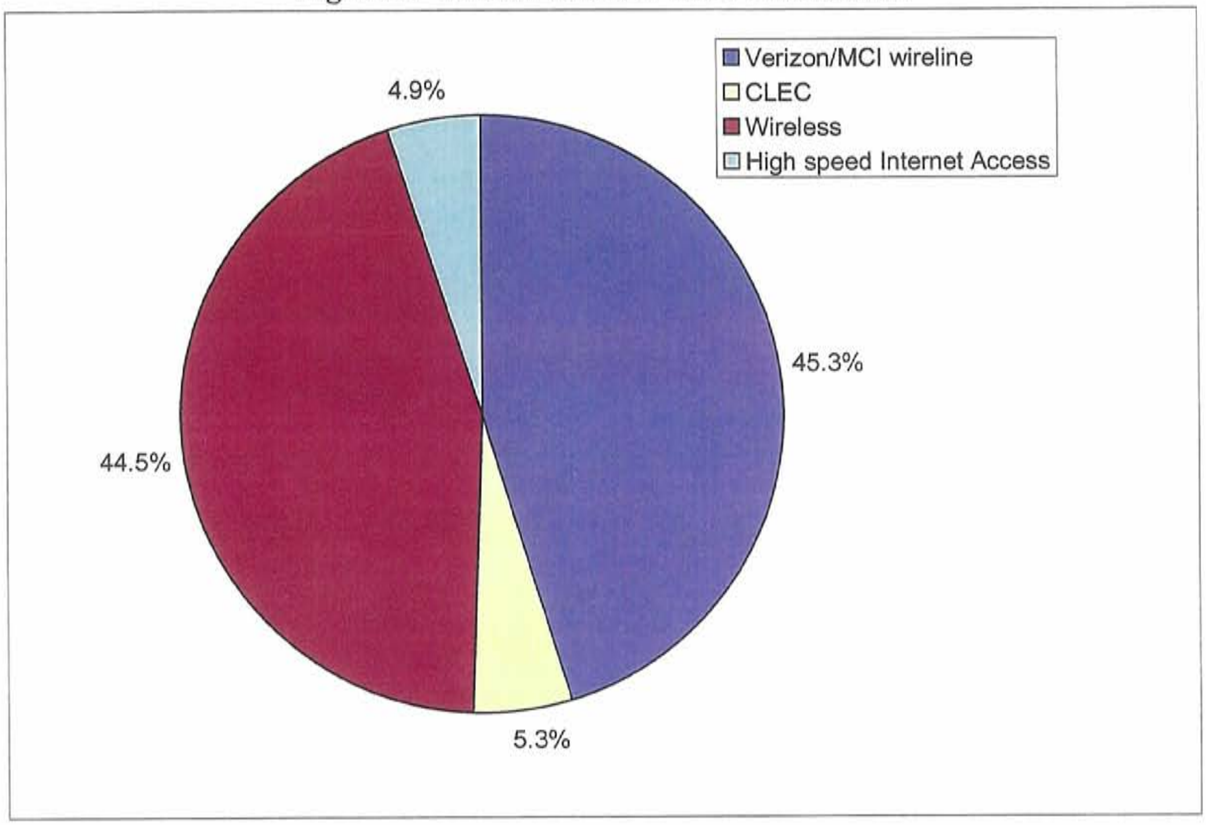
[END CONFIDENTIAL]

Another perspective on Verizon's loss of overall share is shown in Figure 2 below, which shows the percentage of total connections – including wireline telephony, wireless telephony and broadband connections – served by Verizon, based on the survey conducted by Mr. Newman. As

49. *See id.*
50. *See id.*
51. *See id.*

the figure shows, Verizon voice lines now account for only 45.3 percent of all wireline telephony, wireless telephony and broadband connections.[52]

Figure 2: Verizon Share of Total Connections



IV. POTENTIAL COMPETITION AND ENTRY

While competition from CLECs using resale and/or Wholesale Advantage services, from CMRS providers and from wireless broadband providers is already present in the Southside region, the potential for additional competition is also evident.

First, Adelphia's assets in Virginia have recently been purchased by Comcast.[53] The entire Comcast infrastructure has been upgraded and is thus capable of offering retail telephone services quickly and with little additional investment,[54] and Comcast has announced plans to roll out cable telephony over the former Adelphia service territory.[55] More than 80 percent of the Charter infrastructure is also cable-telephony-ready,[56] meaning that it too could easily deploy

52. *See* Exhibit VA-22.
53. *Time Warner Inc./Comcast Corp. Cable-TV Giants Complete Acquisition of Adelphia Assets*, WALL ST. J., Aug. 1, 2006.
54. *See* Exhibit VA-10.
55. *See* West Testimony at 42. *See also* Comcast, FAQ, https://www.comcast.com/Customers/FAQ/FaqDetails.ashx?Id=3804 (last visited Dec. 3, 2006); *id.* at https://www.comcast.com/Customers/FAQ/FaqDetails.ashx?Id=3807 (last visited Dec. 3, 2006).
56. *See* Exhibit VA-10.

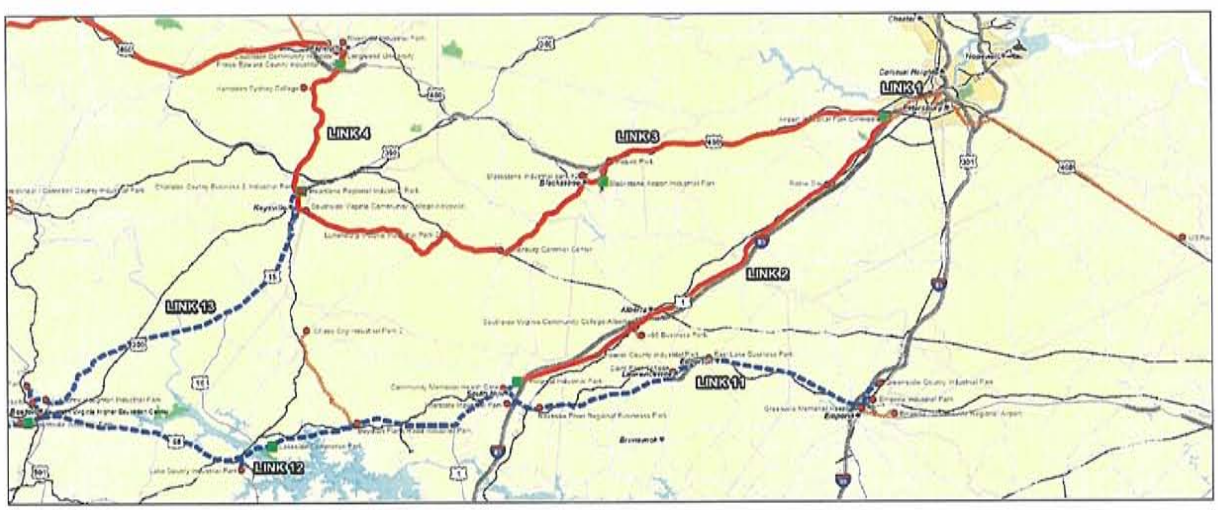
cable telephony services without a substantial additional investment. Together, the two companies are in a position to deploy cable telephony to 50.6 percent of households.[57]

Facilities-based CLECs are also well-positioned to expand their offerings. Nationsline, for example, has already collocated facilities in two of the nineteen wire centers, and serves customers (through resale) in 18 of the 19 wire centers.

Non-facilities based companies, which provide services using resale and/or Wholesale Advantage services purchased from Verizon, are completely unconstrained in their ability to expand services. In the event of a price increase by Verizon, these companies could and would accommodate customers wishing to switch away from Verizon's services.

More broadly, barriers to entry in the Southside region are relatively low, in part due to a dramatic increase in the availability of high-capacity fiber. KDL is currently constructing points of presence in Clarksville, Emporia, Farmville and Keysville.[58] And, as shown in Figure 3, the new fiber infrastructure constructed by the Mid-Atlantic Broadband Cooperative includes multiple regional hubs and points of presence throughout the region.

Figure 3: MBC Fiber Infrastructure in the Southside Region



There are already six CMRS providers other than Verizon serving the Southside region, and the widespread presence of cell towers (there are towers in 16 of the 19 wire center areas, and 8 new towers have been constructed since 2004) means that the mobile and fixed wireless entry is also inexpensive. Finally, 100 percent of the region's population lives in rural wire centers potentially eligible for funding from the Rural Utilities Service (RUS). Moreover, six of the eight counties (Brunswick, Charlotte, Greensville, Halifax, Lunenburg and Mecklenburg) are eligible for support from the Tobacco Commission.[59]

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57. *See* Exhibit SSDE-10.
58. Kentucky Data Link, KDL Network Map, http://www.kdlinc.com/wps-html/KDLNetworkMap (last visited Nov. 29, 2006).
59. *See* Eisenach Testimony at Table 2.

V. CONCLUSION

Both residential and business consumers have multiple alternatives to Verizon's retail telephone services in the Southside region. Verizon is already losing customers to traditional CLECs and intermodal competitors, and this decline is taking place *at current prices.* The two cable companies, Charter and Comcast, are in a position to deploy cable telephony services quickly and without significant additional investment to more than half of all households, and Comcast has announced plans to do so in the immediate future. The recent and ongoing dramatic expansion of the region's fiber infrastructure also reduces the cost of entry and enhances the viability of actual and potential competitors. If Verizon were to raise prices above competitive levels, it would both accelerate the rate at which it is losing customers to existing competitive services,[60] and increase the rate at which competitors and potential competitors deploy new services in the market. The availability of options already in the region, the announced intentions of actual competitors to expand their services, and the potential for additional competition are adequate to regulate the price of Verizon's retail telephone services in this region.

60. An analysis conducted by Dr. Taylor estimates that a decision by Verizon to raise prices by 5 percent in the Southside region would result in a *net* revenue loss of **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]** annually. *See* Taylor Testimony, Table 14 at 94.

SSDE-3

Wire Centers by Rate Group, Exchange, City and County

REGION	LOC ST	WIRECENTER	LOCATION NAME	Rate Group	Exchange	CENTRAL OFFICE CITY	COUNTY
Southside	VA-E	CLVRVACL	CLOVER VA	03	CLOVER	CLOVER	Halifax
	VA-S	ALBRVAXA	ALBERTA	04	ALBERTA	ALBERTA	Brunswick
		BRVIVAXA	BARNESVILLE	06	BARNESVILLE	BARNESVILLE	Charlotte
		BYKNVAXA	BOYKINS	07	BOYKINS	BOYKINS	Southampton
		BYTNVAXA	BOYDTON	05	BOYDTON	BOYDTON	Mecklenburg
		CCHSVAXA	CHARLOTTE COURT HOUSE	05	CHARLOTTE COURT H	CHARLOTTE COURT HOUSE	Charlotte
		CLVLVAXA	CLARKSVILLE	05	CLARKSVILLE	CLARKSVILLE	Mecklenburg
		CPRNVAXA	CAPRON	07	CAPRON	CAPRON	Southampton
		CRLDVAXA	COURTLAND	07	COURTLAND	COURTLAND	Southampton
		CSCYVAXA	CHASE CITY	05	CHASE CITY	CHASE CITY	Mecklenburg
		DRBRVAXA	DRAKES BRANCH	05	DRAKES BRANCH	DRAKES BRANCH	Charlotte
		EMPRVAXA	EMPORIA	07	EMPORIA	EMPORIA	Emporia City
		EPFKVAXA	EPPES FORK	08	EPPES FORK	EPPES FORK	Mecklenburg
		FKLNVAXB	FRANKLIN	10	FRANKLIN	FRANKLIN	Franklin City
		IVORVAXA	IVOR	07	IVOR	IVOR	Southampton
		JRRTVAXA	JARRATT	05	JARRATT	JARRATT	Greensville
		KYVLVAXA	KEYSVILLE	07	KEYSVILLE	KEYSVILLE	Charlotte
		LRVLVAXA	LAWRENCEVILLE	06	LAWRENCEVILLE	LAWRENCEVILLE	Brunswick
		SBWKVAXA	SOUTH BRUNSWICK	06	SOUTH BRUNSWICK	SOUTH BRUNSWICK	Brunswick

SSDE-4

CONFIDENTIAL

EXHIBIT SSDE-4

SSDE-5

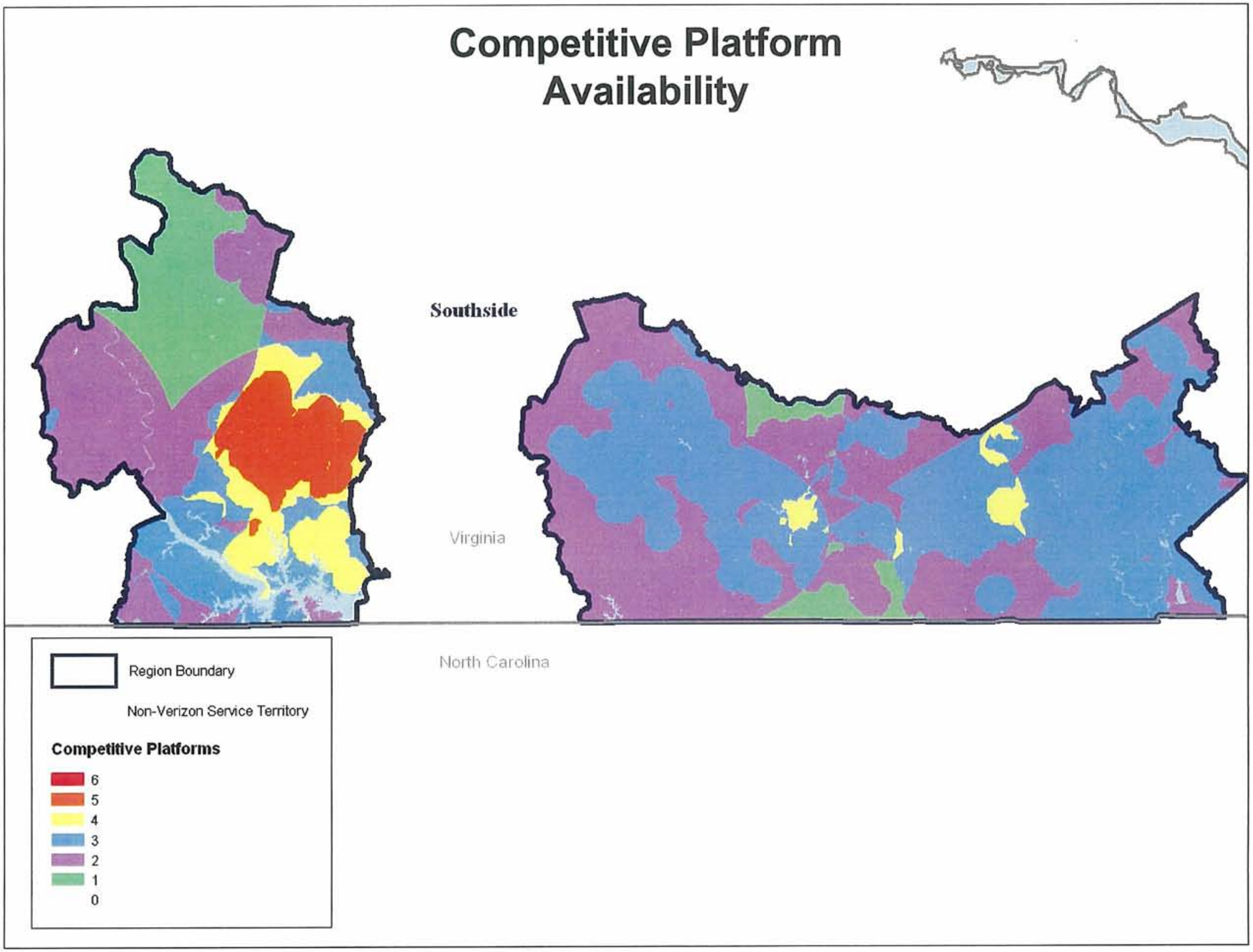


Exhibit SSDE-5

SSDE-6

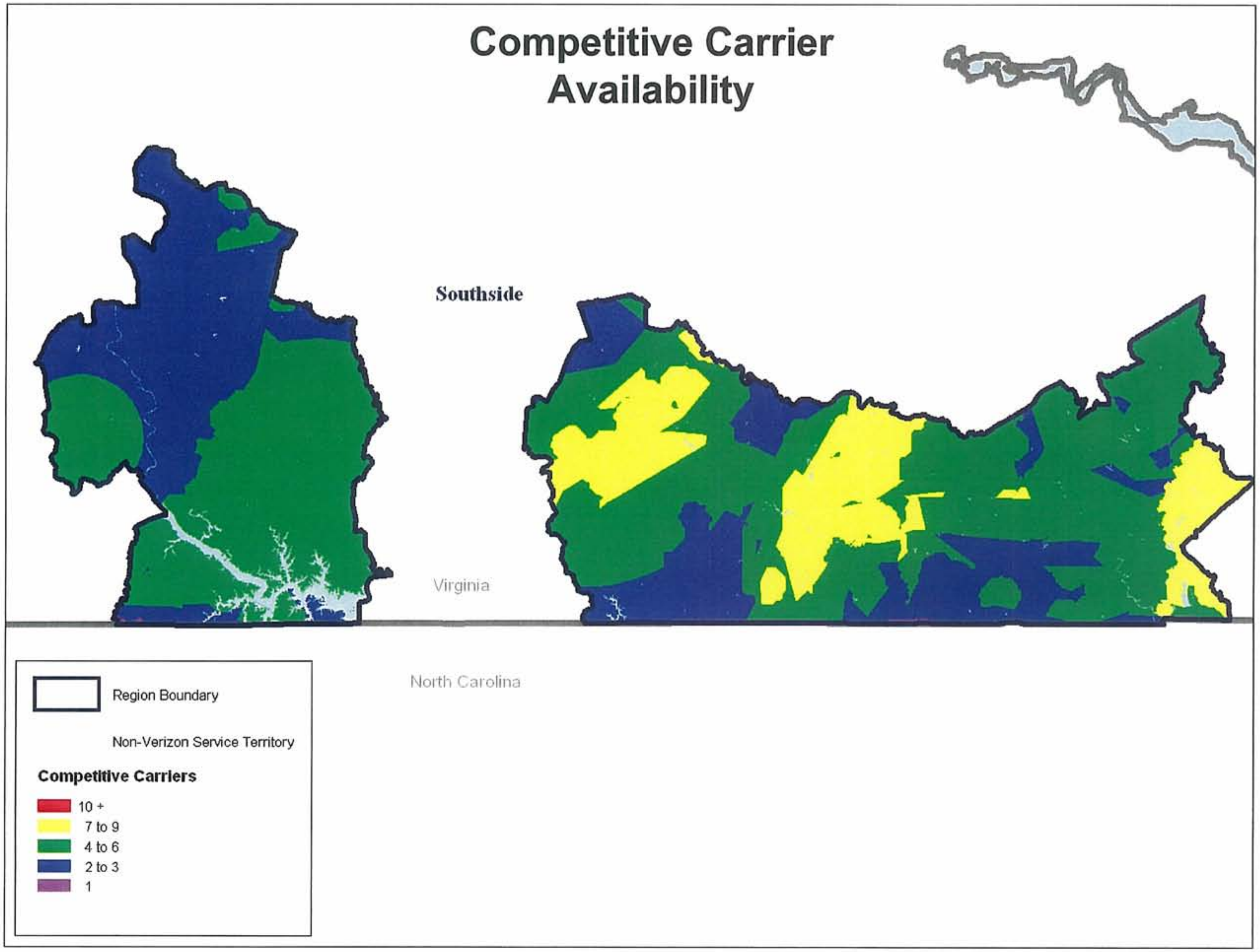


Exhibit SSDE-6

SSDE-7

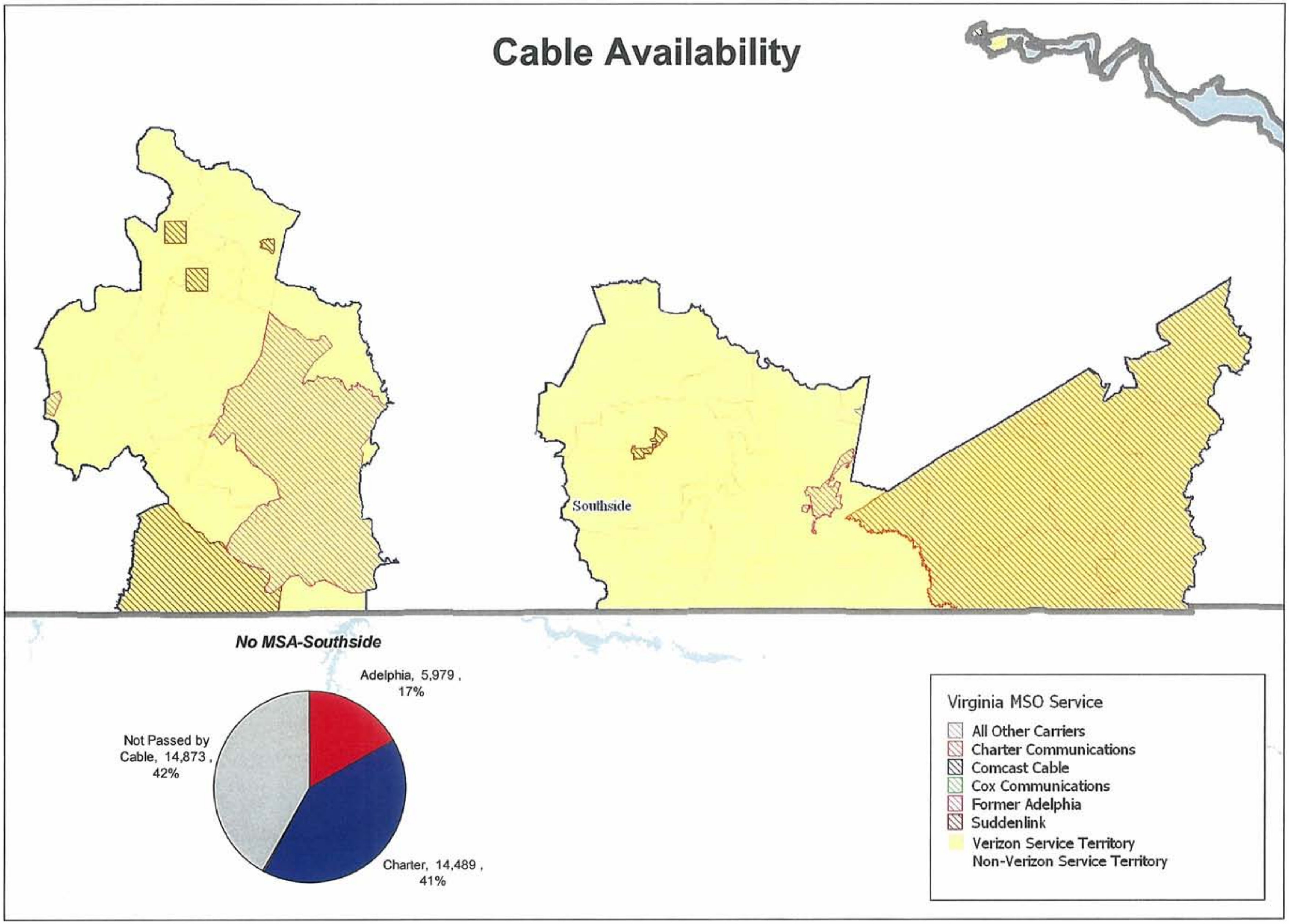
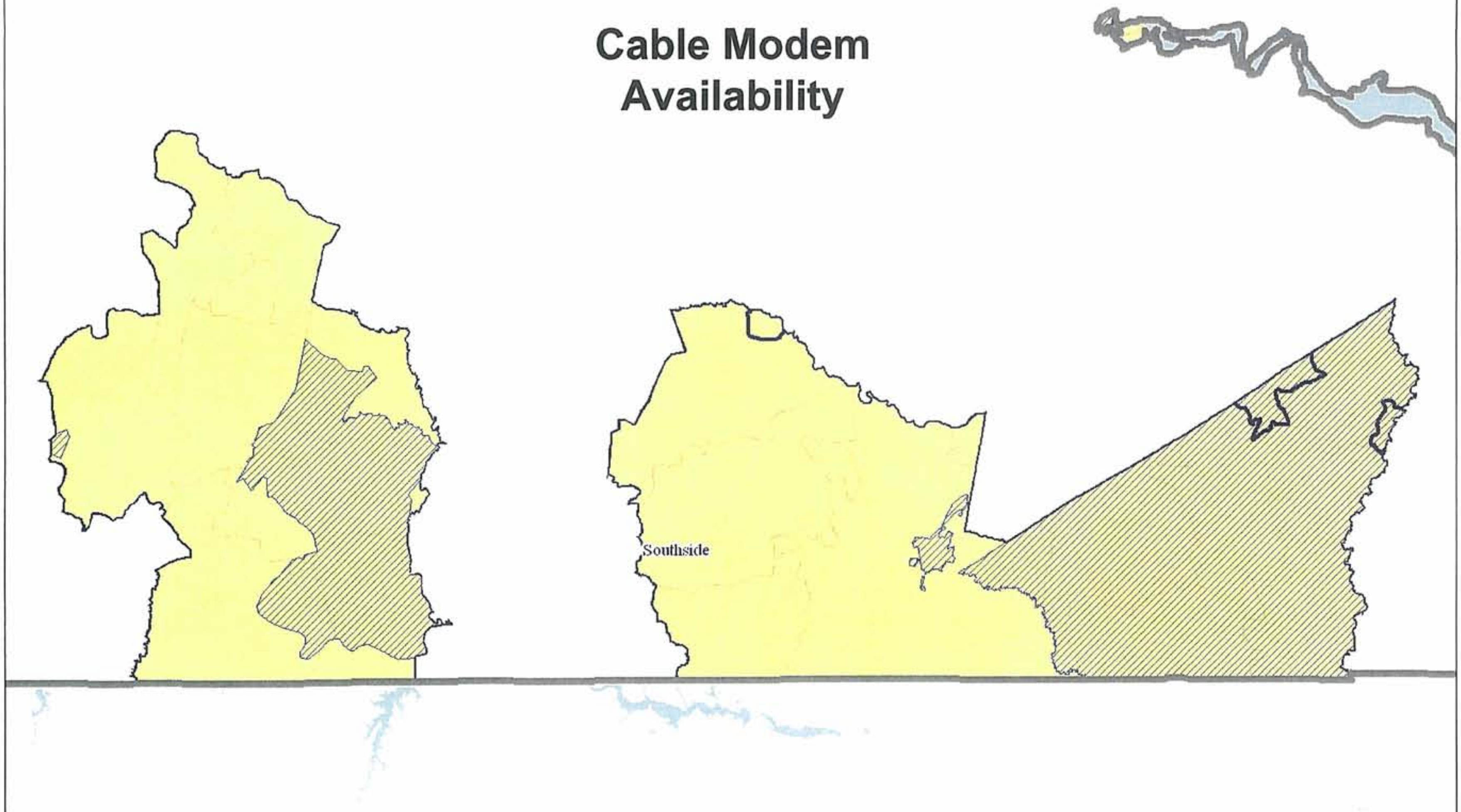


Exhibit SSDE-7

Note: HH numbers reflect only those households in Verizon's Service Territory

SSDE-8

Cable Modem Availability



Total HH 35,354

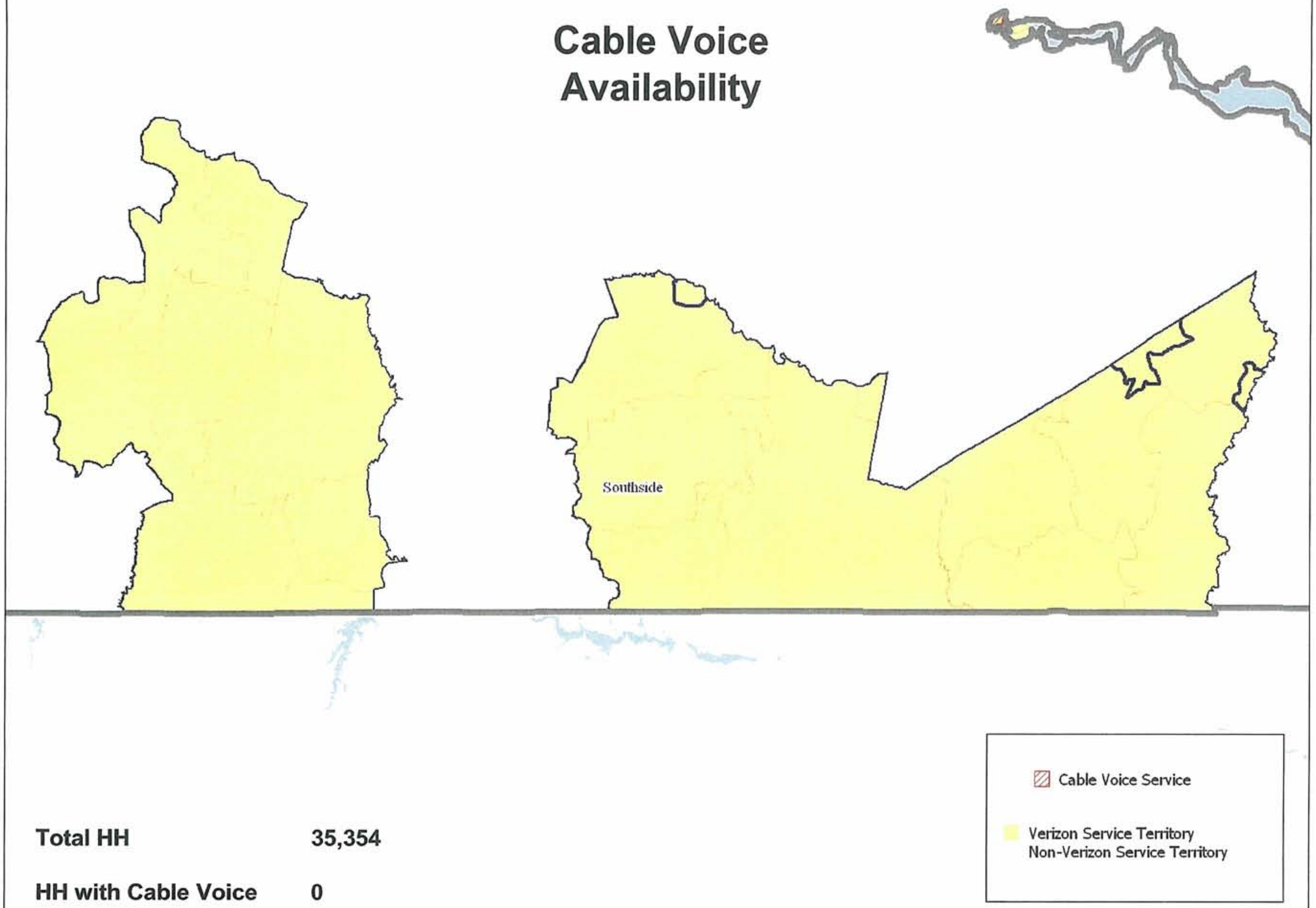
HH with Cable Modem 17,916 (51%)

Exhibit SSDE-8

Note: HH numbers reflect only those households in Verizon's Service Territory

SSDE-9

Cable Voice Availability



Total HH	**35,354**
HH with Cable Voice	**0**

Exhibit SSDE-9

Note: HH numbers reflect only those households in Verizon's Service Territory

SSDE-10

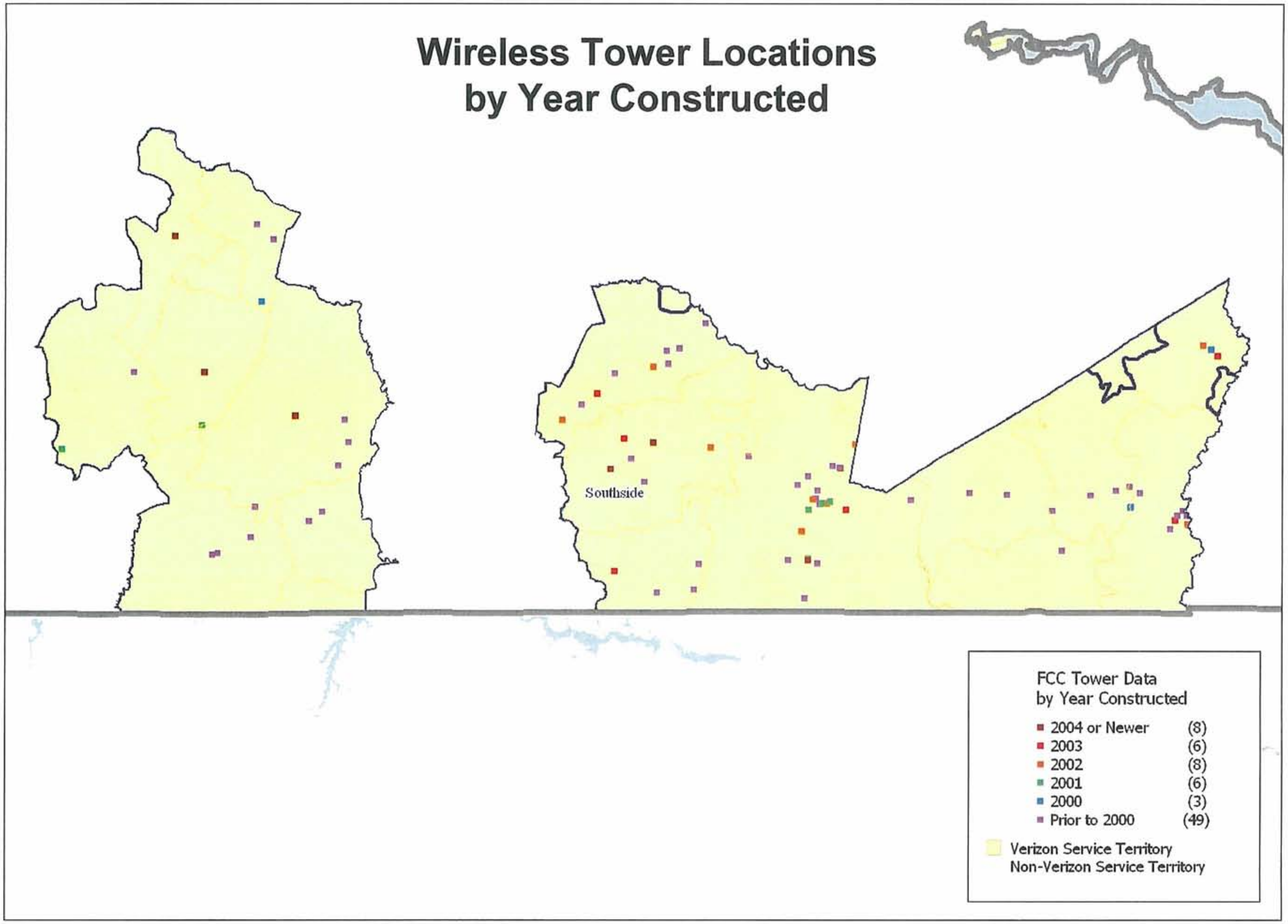
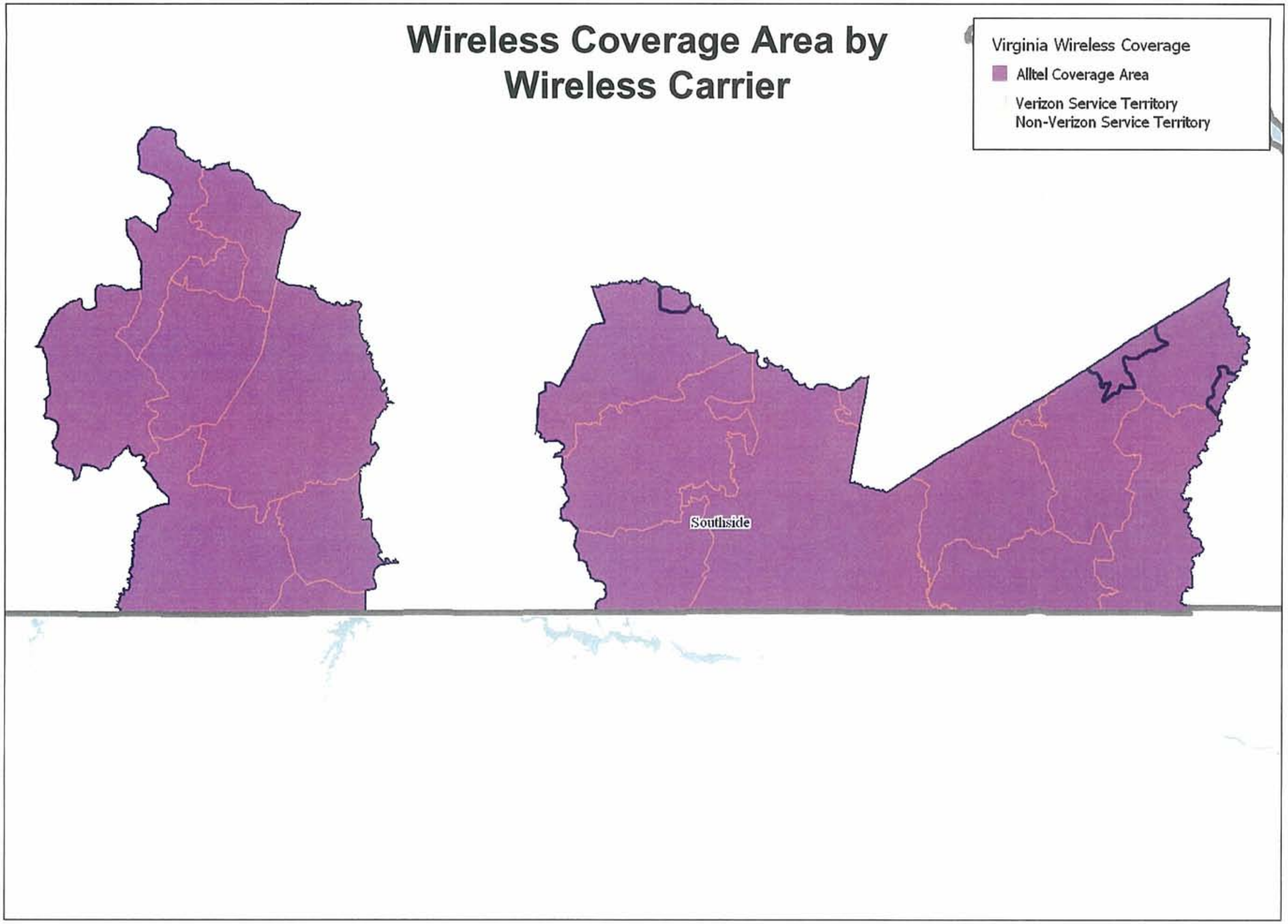


Exhibit SSDE-10

SSDE-11

Wireless Coverage Area by Wireless Carrier



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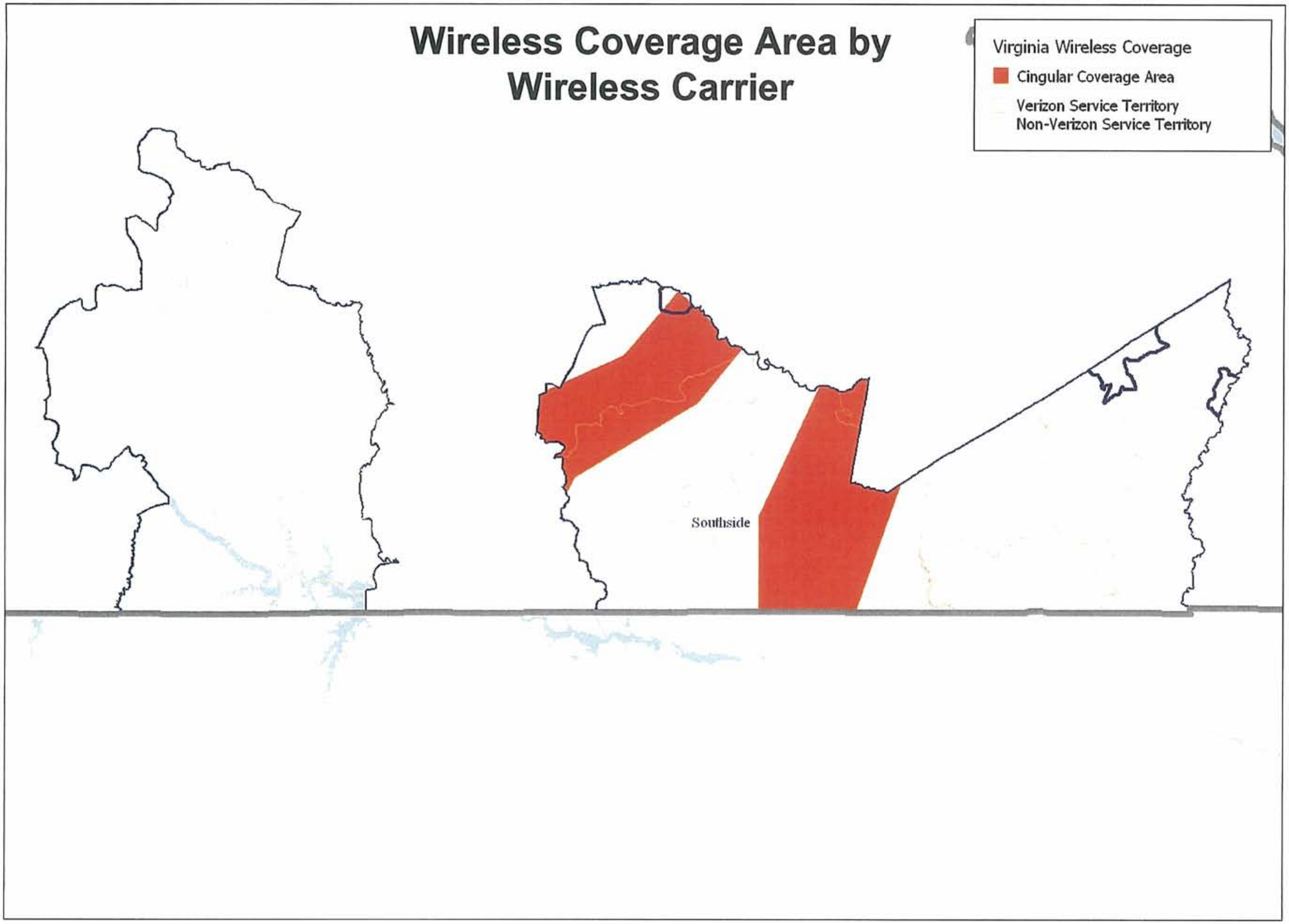
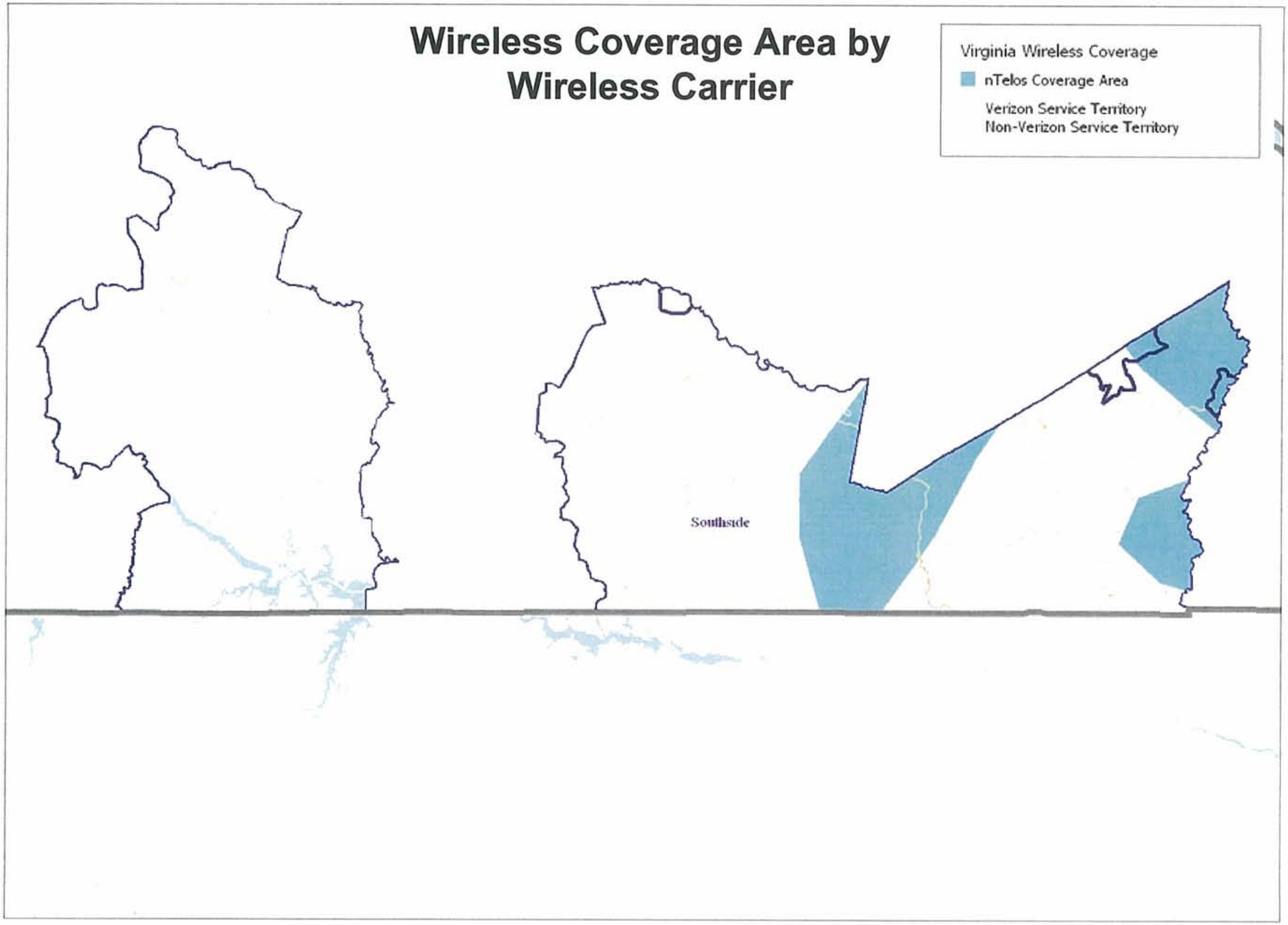


Exhibit SSDE-11, page 2 of 7



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Wireless Coverage Area by Wireless Carrier

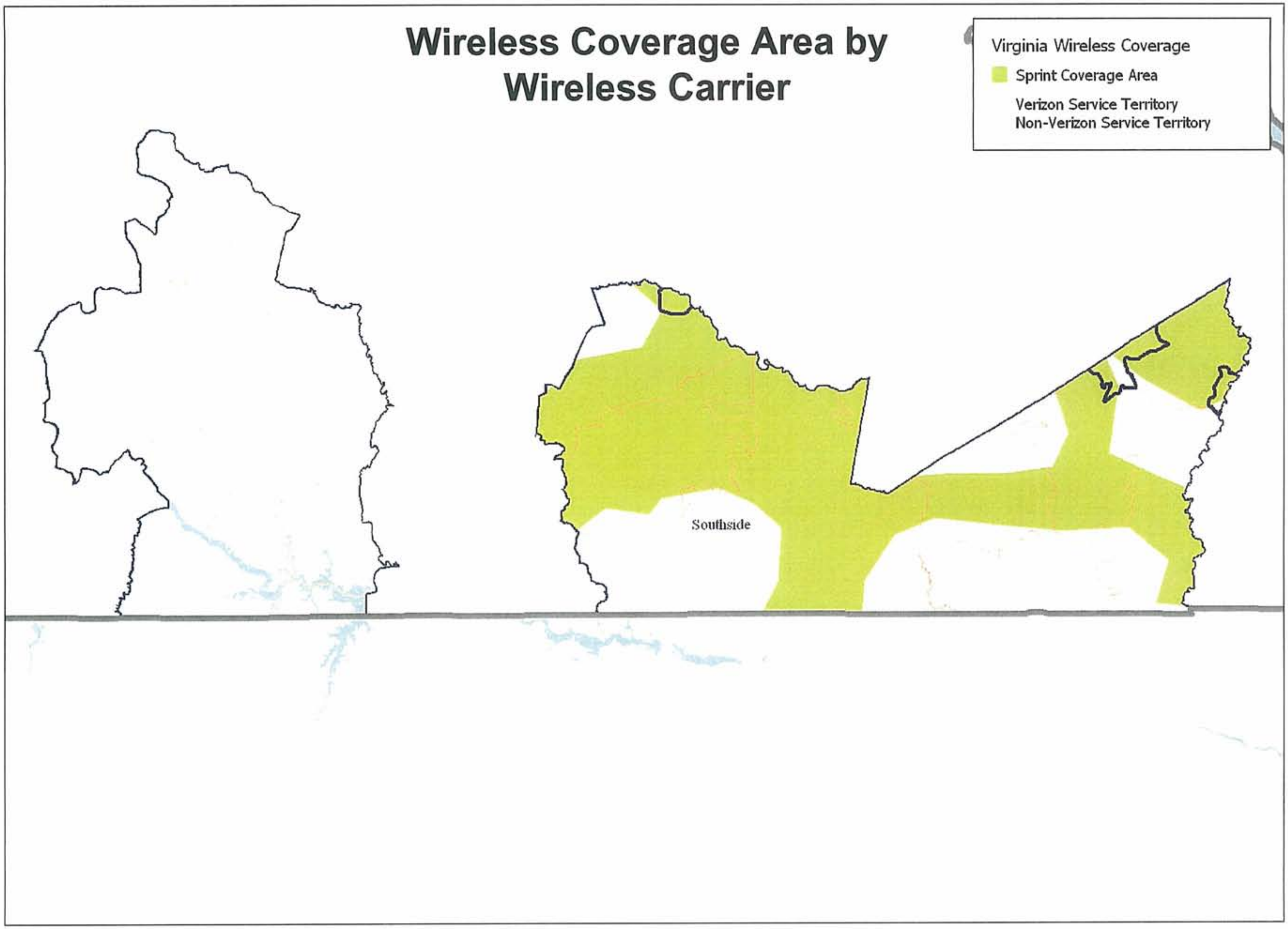


Exhibit SSDE-11, page 4 of 7

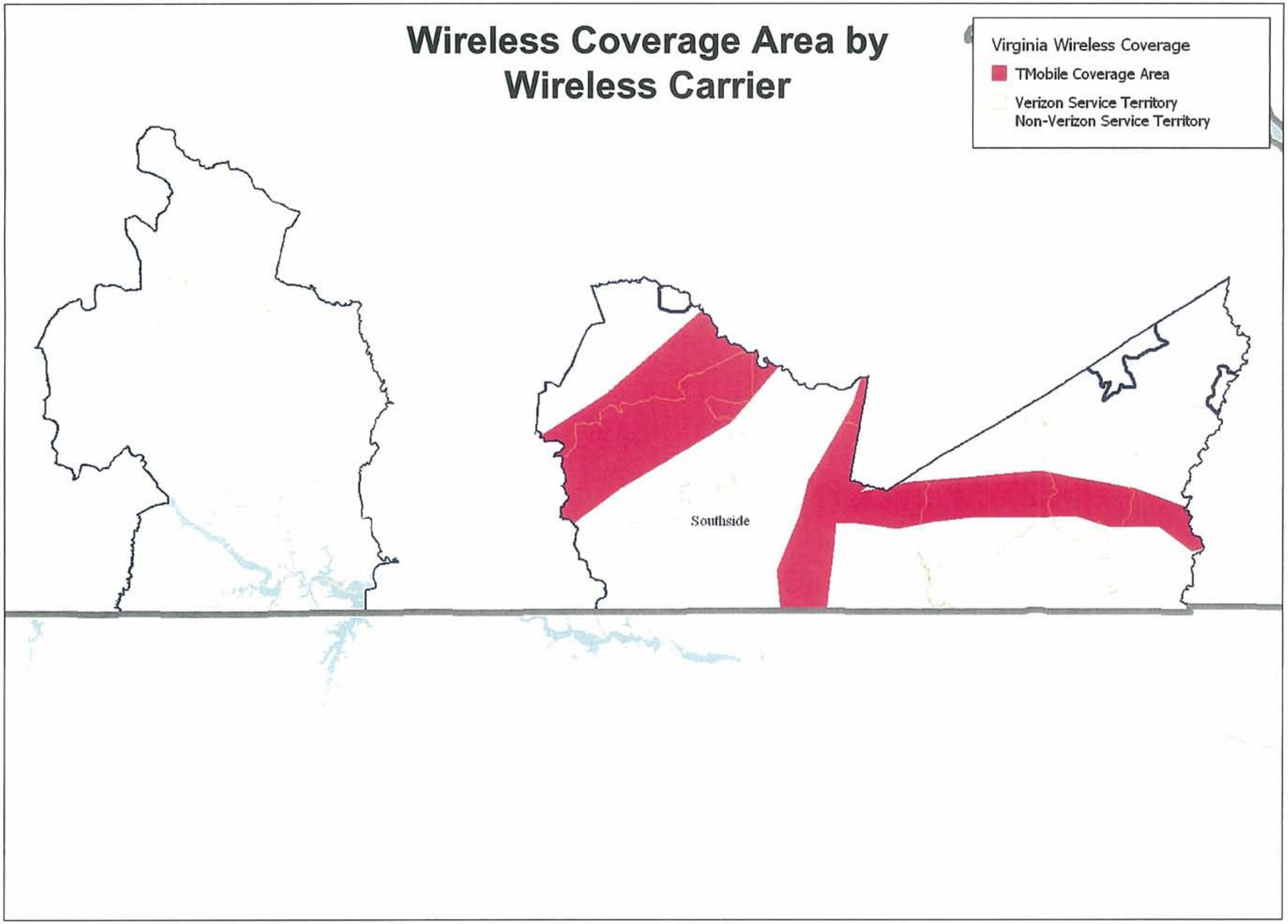
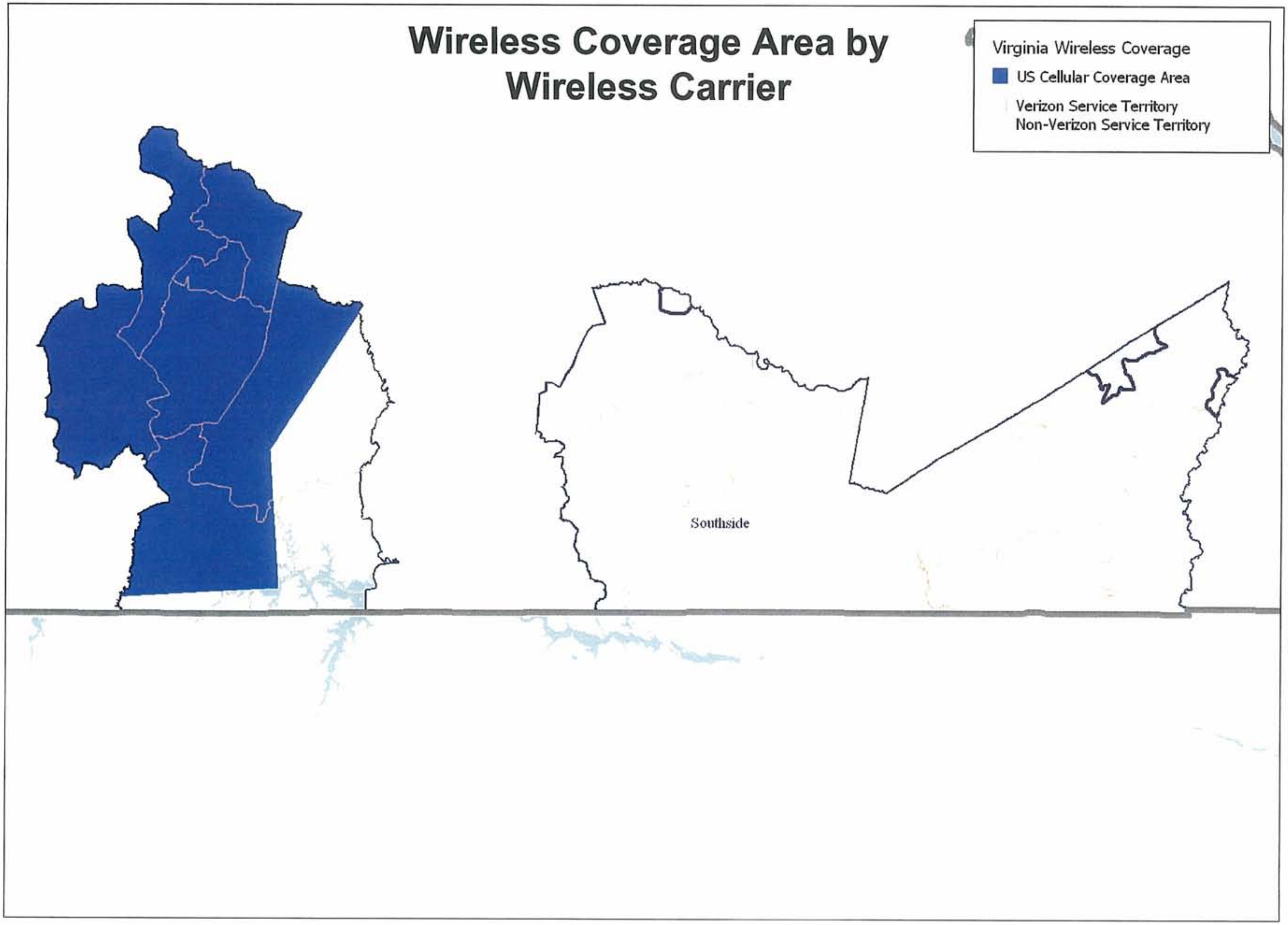


Exhibit SSDE-11, page 5 of 7

Wireless Coverage Area by Wireless Carrier



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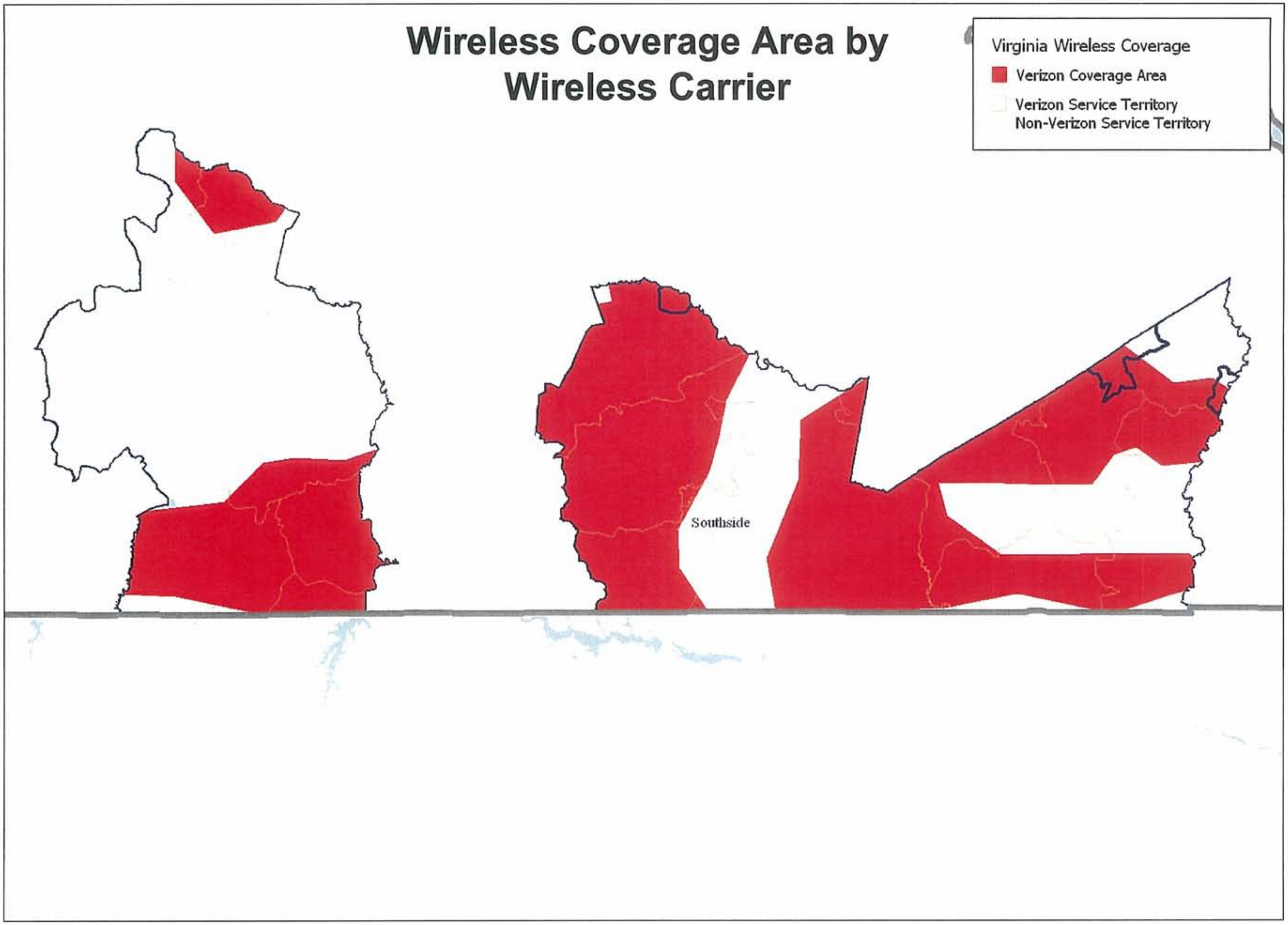
Wireless Coverage Area by Wireless Carrier



SSDE-12

Wireless Coverage Area by Number of Carriers

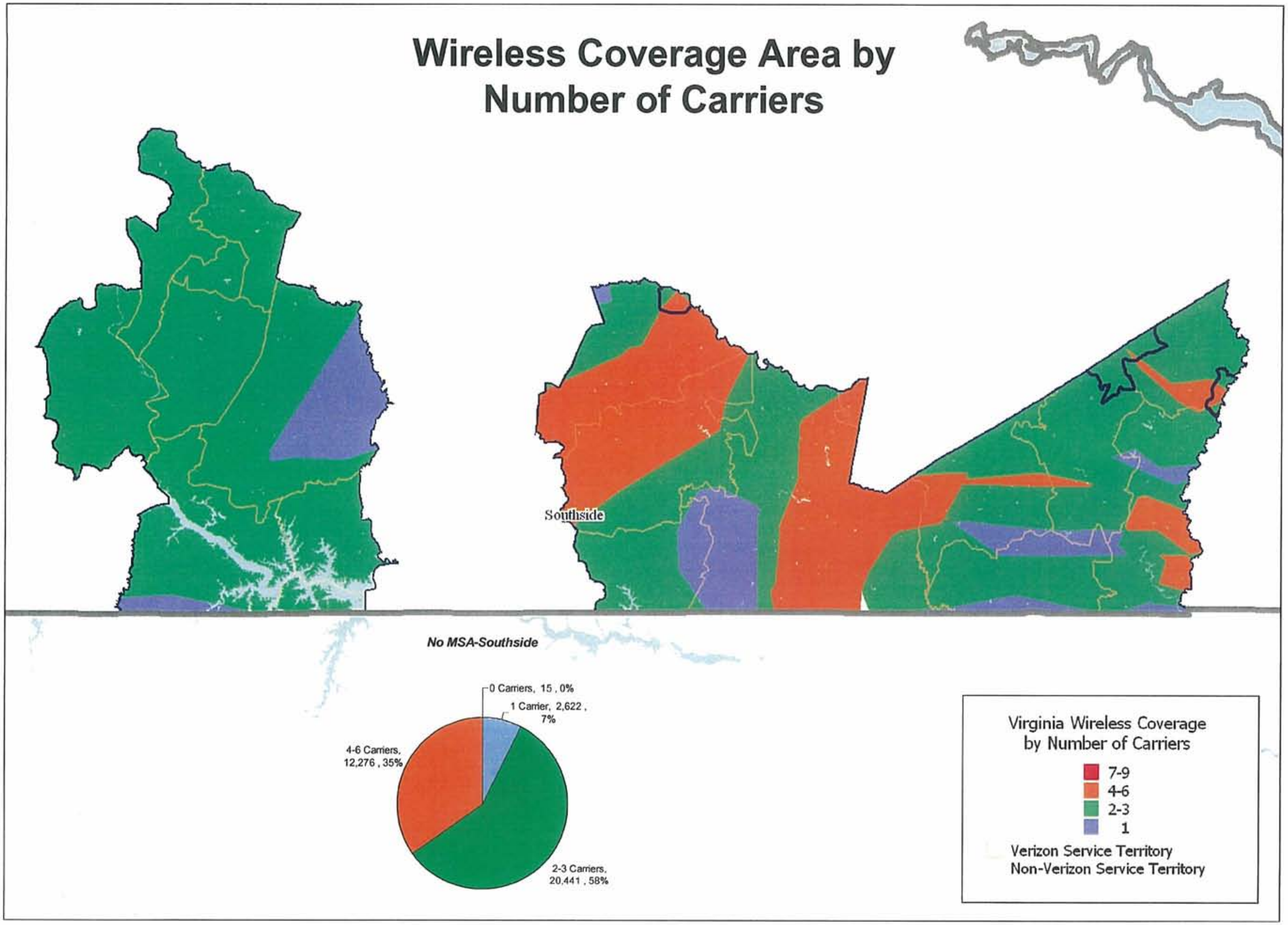
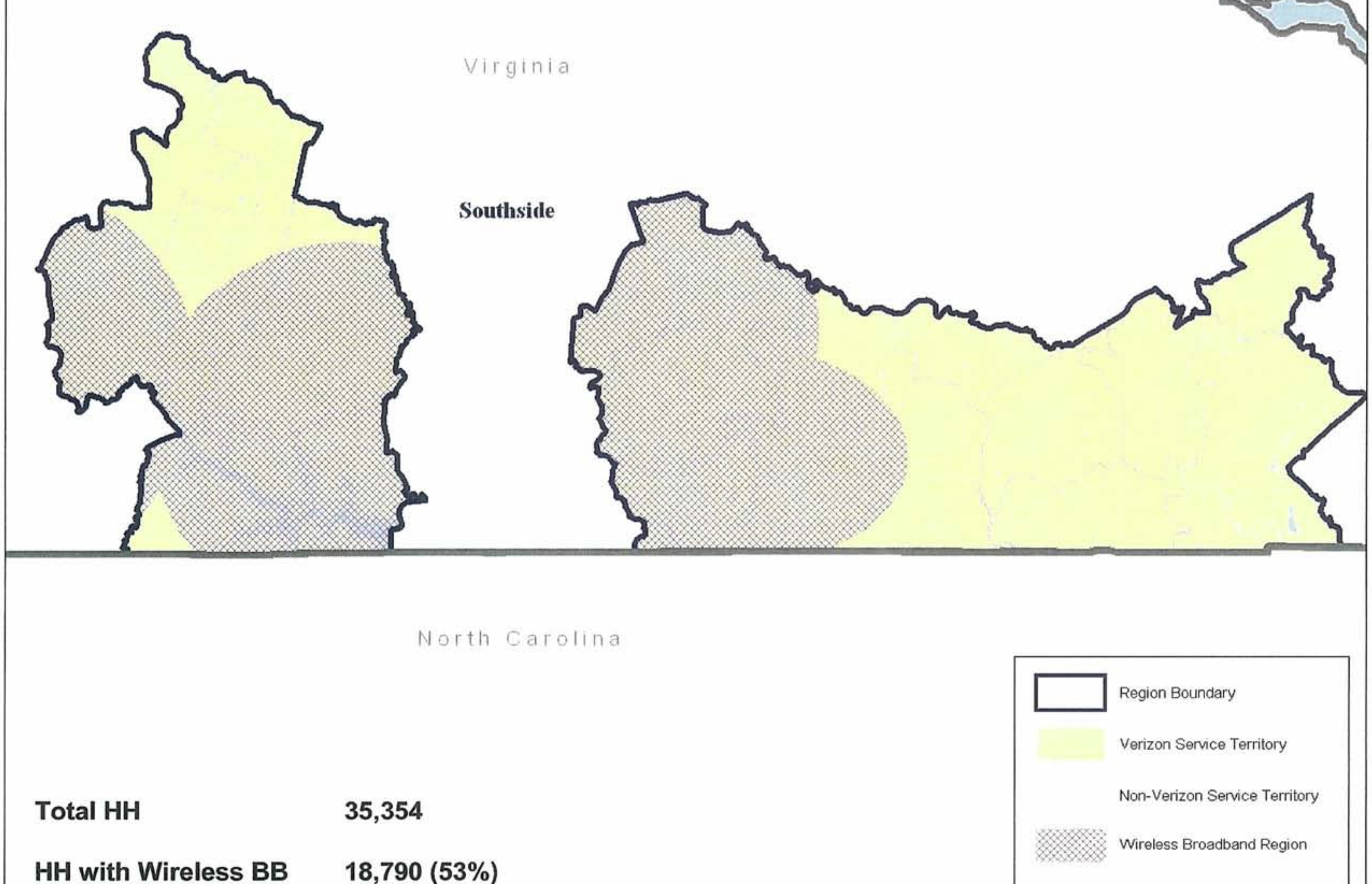


Exhibit SSDE-12

Note: HH numbers reflect only those households in Verizon's Service Territory

SSDE-13

Wireless Broadband Coverage



Total HH 35,354

HH with Wireless BB 18,790 (53%)

Exhibit SSDE-13

Note: HH numbers reflect only those households in Verizon's Service Territory

SSDE-14

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EXHIBIT SSDE-14

SSDE-15

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EXHIBIT SSDE-15

SSDE-16

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EXHIBIT SSDE-16

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EXHIBIT SSDE-17

SSDE-18

CONFIDENTIAL

EXHIBIT SSDE-18

SSDE-19

CONFIDENTIAL

EXHIBIT SSDE-19